

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of  
*(Briefly describe the property to be searched  
or identify the person by name and address)*  
 9563 Conservancy Place  
 West Chester Township, OH 45011

)  
)  
)

Case No. 1:21-MJ-885

**APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A.

located in the Southern District of Ohio, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, United States Code, Section 846	Conspiracy to possess with intent to distribute and distribute controlled substances

The application is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days*: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Cameron C. Rice

*Applicant's signature*

Cameron C. Rice, Special Agent DEA

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
 FaceTime video conference \_\_\_\_\_ (*specify reliable electronic means*).  
Stephanie K. Bowman



*Judge's signature*

Hon. Stephanie K. Bowman, U.S. Magistrate Judge

*Printed name and title*

Date: Nov 15, 2021

City and state: Cincinnati, Ohio

## AFFIDAVIT

I, Cameron C. Rice, being duly sworn, do hereby depose and state as follows:

### I.

#### **INTRODUCTION**

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510 (7) of Title 18, United States Code, that is, an officer of the United States who is empowered by the law to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code, Section 2516. 5. I am a Special Agent (“SA”) of the Drug Enforcement Administration (“DEA”) and have been so employed since February 2018. Prior to being employed with the DEA, I was employed as a State Trooper for the State of Ohio for over two years. I graduated from Coast Guard Boot Camp, the Ohio State Highway Patrol Academy, American Military University, and the DEA Basic Agent Academy. As a Special Agent of the DEA, my duties and responsibilities include conducting criminal investigations for violations of federal law, particularly those found in Title 21 and Title 18 of the United States Code. As a DEA agent, I have participated in several federal criminal investigations seeking evidence of violations of, inter alia, the Federal Controlled Substances Act (Title 21 of the United States Code). 6. I am currently assigned to the Cincinnati District Office of the DEA. I received specialized training from the DEA, including the 18-week Basic Agent Training course. That training focused on methods of unlawful drug trafficking; the identification of controlled substances; surveillance; undercover operations; confidential source management; the means by which drug traffickers derive, launder, and conceal their profits from drug trafficking; the use of assets to facilitate unlawful drug trafficking activity; and, the law permitting the forfeiture to the United States of assets purchased with drug proceeds or assets used or intended to be used to facilitate the drug violations.

### II.

#### **PURPOSE OF AFFIDAVIT**

2. This Affidavit is submitted in support of a warrant to search the following location--namely, 9563 Conservancy Place, West Chester Township, OH 45011 -- a property more fully described in Attachment A hereto -- for the person of Steffen ROBERSON, who currently has a federal arrest warrant who is identified more fully in Attachment B. The information contained in this Affidavit is largely based upon an investigation conducted by your Affiant and other law enforcement officers. All of the details of the investigation are not included in this Affidavit, rather only information necessary to establish probable cause to issue a search warrant for 9563 Conservancy Place, West Chester Township, OH 45011.

### III.

#### **SUMMARY OF PROBABLE CAUSE**

3. Such belief is supported by the following facts and probable cause: Police Officer Jonce Tackett, a Cincinnati Police Officer, and myself, both with extensive training and experience investigating drug trafficking offenses, are currently involved in an ongoing drug trafficking investigation involving suspects Steffen ROBERSON, Alton BEACHER, and Quinton JENNINGS.
4. Between August 30 and September 1, 2021, agents/officers met with CI#1 to conduct a controlled methamphetamine purchase from BEACHER. Prior to the controlled purchase, agents/officers searched CI#1 and CI#1's vehicle for contraband and US currency. Agents/officers did not locate any contraband or US Currency on CS#1 or inside CS#1's vehicle. The agents/officers directed CI#1 to place a one-party, consensually recorded phone call to BEACHER on cellular telephone number (419) 936-0005 (hereinafter referred to as BEACHER Phone #1).
5. During the conversation, BEACHER told CI#1 to go to "the spot" and that "Smoke" will provide CI#1 with the methamphetamine. CI#1 knows "the spot" to mean the apartment later identified as 1441 Hillcrest Road. Agents/officers provided CI#1 with an audio/video recording device and pre-recorded US currency to use during the controlled buy. While under the constant monitoring and control of the agents/officers, CI#1 traveled to 1441 Hillcrest Road. CI#1 entered the common entry door for 1441 Hillcrest Road, walked up one flight of stairs, and entered the door to the right at the top of the first flight of steps, Apartment 4. CI#1 was let inside and met by "Smoke." CI#1 provided "Smoke" with the recorded US currency in exchange for methamphetamine.
6. While inside the apartment, CI#1 spoke with another individual known to him/her as "Worm." CI#1 stated "Worm" offered to sell CI#1 cocaine. CI#1 then left the meet location and traveled to a neutral location while under constant monitoring and control of agents/officers. Agents/officers met with CI#1 where CI#1 immediately surrendered an amount of suspected methamphetamine and the digital recording device. Agents/officers searched CI#1 and CI#1's vehicle for contraband and US currency. No contraband or US Currency was recovered from CS#1's person or vehicle. The suspected methamphetamine was transported to the Hamilton County Coroner's Lab for analysis. Agents/officers received a confirmation from the Hamilton County Crime Laboratory (CL21-06102) that the suspected methamphetamine purchased from Quinton JENNINGS at the direction of BEACHER was methamphetamine, a schedule II-controlled substance.

7. CI#1 confirmed to the agents/officers that "Smoke" provided him/her with the methamphetamine. Agents/officers are familiar with an individual, Quinton JENNINGS, a male black born April 13, 1982, who goes by the street name "Smoke" from a previous drug investigation in the College Hill neighborhood of Cincinnati, Ohio. Agents/officers showed CI#1 a recent Ohio BMV photo of Quinton JENNINGS. CI#1 positively identified the photo of Quinton JENNINGS as who s/he knows as "Smoke." Agents/officers searched the Hamilton County Clerk of Courts records and learned Quinton JENNINGS has previous felony convictions for robbery, trafficking in heroin, and possession of heroin.
8. Agents/officers are also familiar with an individual from a previous drug trafficking investigation by the name of Steffen ROBERSON, a male black born January 12, 1981, who goes by the street name "Worm." Agents/officers showed CI#1 a recent Ohio BMV photo of Steffen ROBERSON. CI#1 positively identified the photo of Steffen ROBERSON as who s/he knows as "Worm," and as the person who offered to sell cocaine to CI#1 during the controlled purchase. Agents/officers searched the Hamilton County Clerk of Courts records and learned Steffen ROBERSON has previous convictions for possession of cocaine, tampering with evidence, possession of marijuana, possession of heroin, and trafficking in cocaine.
9. CI#1 stated s/he does not have a phone number for ROBERSON but stated if s/he needs to contact ROBERSON, s/he calls JENNINGS at (513) 430-6338 (hereinafter referred to as "JENNINGS Phone #1"). CI#1 stated JENNINGS uses JENNINGS Phone #1 to coordinate cocaine sales with customers and co-conspirators, including ROBERSON.
10. On September 2, 2021, agents/officers directed CI#1 to place a one-party consensually recorded Facetime call to JENNINGS on JENNINGS Phone #1. During the Facetime call with JENNINGS, CI#1 asked about the cocaine ROBERSON offered to CI#1. JENNINGS stated he had to call ROBERSON to see if he's at the "spot" known to CI#1 as 1441 Hillcrest Road, Apartment 4. CI#1 attempted to call JENNINGS again on JENNINGS Phone #1 with no answer. CI#1 was debriefed and released.

### **SURVEILLANCE**

11. On November 2, 2021, agents/officers reviewed the court authorized GPS Phone Pings for ROBERSON Phone #1 and learned that at approximately 4:23 p.m., the handheld device for ROBERSON Phone #1 was in Butler County, Ohio near the intersections of Muhlhauser Road and State Route 747, Princeton-Glendale Road. Agents/offices drove to the area and observed Target Vehicle #4 parked in the driveway of 9563 Conservancy Place, West Chester Township, Ohio 45011 (SUBJECT LOCATION 1). At approximately 4:25 p.m., agents/officers observed two male blacks get into Target Vehicle #4 and pull out of the driveway of SUBJECT LOCATION 1. Agents/officers followed Target Vehicle #4 as it traveled southbound into Hamilton County, Ohio, eventually losing sight of Target Vehicle #4. A review of GPS phone pings for ROBERSON Phone #1 revealed the handheld device traveled away, southbound, from SUBJECT LOCATION 1 with Target Vehicle #4 eventually stopping in the area of 10046 Trapp Lane at approximately 4:48 p.m.

12. Agents/officers reviewed historical GPS phone pings for ROBERSON Phone #1 and learned the handheld device spent several overnights in the area of SUBJECT LOCATION 1 including the overnight of November 2, 2021. A review of historical tolls for Roberson Phone #1 also revealed the top incoming/outgoing calls for Roberson Phone #1, (404) 863-7483, was with phone number (513) 570-2727. Law enforcement databases revealed this number is associated with Dominique Hill, a female black born September 30, 1989, who provides the address of SUBJECT LOCATION 1 to the Ohio BMV. Additionally, Dominique Hill shares a child with ROBERSON.
13. On November 3, 2021, agents/officers met with Butler County Common Pleas Judge Gregory Howard who authorized a GPS tracking warrant for ROBERSON's white 2018 Honda bearing Texas plate 28680K5.
14. On November 4, 2021, at 12:30 p.m., Agents reviewed the lawfully obtained GPS phone pings for ROBERSON Phone #1 and learned the handheld device was in West Chester Township. Agents located ROBERSON's white Honda Accord in the driveway of SUBJECT LOCATION 1. At 3:47 p.m., agents/officers observed ROBERSON get into the white Honda Accord and pull away from SUBJECT LOCATION 1. Agents/officers were unable to maintain visual of ROBERSON's white Honda Accord due to traffic. At 4:32 p.m., the lawfully obtained GPS phone pings showed ROBERSON Phone #1 in the area of Daly Road and Grenada Drive. At approximately 4:45 pm., agents/officers located White Honda Accord in the driveway of 8685 Daly Road. A search of Hamilton County auditor shows Wanda Roberson, Steffen ROBERSON's mother, as the owner of 8685 Daly Road in addition to 10046 Trapp Lane. 8685 Daly Road was transferred into Wanda Roberson's name on October 29, 2021.
15. Furthermore, on Wednesday, November 10, 2021, at approximately 4:42 a.m., Officer Tackett installed a court authorized GPS tracking device on the white Honda Accord in the driveway of SUBJECT LOCATION 1. Based on my training and experience, and in speaking with other agents/officers, as well as surveillance conducted both physically and electronically by agents/officers observing ROBERSON's white Honda Accord in the driveway of SUBJECT LOCATION 1, I believe ROBERSON is utilizing SUBJECT LOCATION 1 in furtherance of his drug trafficking organization.
16. Based on my training and experience, agents/officers know illegal drug traffickers often change location where they sleep in order to thwart law enforcement efforts to locate them and where they may hide narcotics and proceeds from their illegal activities. Since October 4, 2021, agents and officers have reviewed ping location activity for ROBERSON's cellular telephone, (404) 863-7483 during the overnight hours to determine where ROBERSON is staying and where he may be storing narcotics and/or proceeds from his illegal activities (see below Chart for details).

October 4, 2021 to November 13, 2021 0400hrs to 1000hrs							
	8685 Daly Road	9563 Conservancy Place	10046 Trapp Lane	3920 Old Ludlow	7216 Park Ave	No Data	Outlier
1	10/22/2021	10/27/2021	10/4/2021	10/6/2021	10/12/2021	10/5/2021	10/13/2021
2	10/30/2021	11/1/2021	10/10/2021	10/7/2021	10/14/2021		10/18/2021
3	11/5/2021	11/2/2021	10/11/2021	10/8/2021	10/15/2021		
4	11/6/2021	11/3/2021	10/18/2021	10/25/2021	10/16/2021		
5	11/7/2021	11/8/2021	10/23/2021		10/17/2021		
6		11/9/2021	10/24/2021		10/19/2021		
7		11/10/2021	10/26/2021		10/20/2021		
8		11/11/2021	10/28/2021		10/21/2021		
9		11/12/2021	10/31/2021		10/30/2021		
10		11/13/2021	11/4/2021		11/7/2021		
11							

17. From October 4 through November 13, 2021, ROBERSON stayed at five different residences during the overnight hours, including 7216 Park Avenue, 9563 Conservancy Place, and 8685 Daly Road. ROBERSON most recently stayed overnight at 9563 Conservancy Place, West Chester Township, Ohio 45011 7, from November 8 through November 13, 2021. Based on my training and experience I know narcotics traffickers often use locations associated with girlfriends and their identities to hide evidence of their illegal activities. Based on the fact the occupant of 9563 Conservancy Place, Dominique Hill, is the mother of ROBERSON's child, I believe 9563 Conservancy Place will contain evidence of ROBERSON's involvement in the drug trafficking conspiracy.
18. On November 14, 2021, agents/officers reviewed the lawfully placed GPS tracker on ROBERSON's white Honda Accord and the GPS Phone Pings for ROBERSON PHONE #1 and learned ROBERSON was at the Cincinnati Northern Kentucky Airport (CVG) located in Hebron, Kentucky. Agents submitted an administrative subpoena to Delta Airlines for Steffen ROBERSON's flight information and learned ROBERSON booked a one-way place ticket to Los Angeles, California International Airport (LAX). It should be noted the flight was purchased along with a ticket for Sterling PARRISH I known co-conspirator of the ROBERSON DTO. PARISH for unknown reasons though did not travel with ROBERSON. On November 15, 2021, agents/officers reviewed the GPS Phone pings for ROBERSON PHONE #1 and learned ROBERSON was back at LAX. At 1:04 p.m. Eastern time the GPS Phone ping showed ROBERSON PHONE #1 now in Denver, Colorado. At Approximately 5:40 p.m., the GPS pen register for ROBERSON PHONE #1 showed ROBERSON had landed back in CVG. It is the agents/officers training and experience Los Angeles, California is a source city of illegal drugs illegal entering the United Stated and being distributed throughout the country.

19. Based on all above facts, officers/agents have learned ROBERSON, JENNINGS, and BEACHER are currently involved in an illegal and ongoing conspiracy to store and distribute methamphetamine, cocaine, and fentanyl in the Greater Cincinnati area. Agents/officers have learned ROBERSON uses a white 2018 Honda bearing Texas license plate 28680K5 to store, distribute, and transport narcotics, weapons, and proceeds from the sale of narcotics. Based on both electronic and physical surveillance. Agents/officers have learned that ROBERSON uses the handset using cellular telephone number (404) 863-7483 (Roberson Phone #1) to coordinate drug transactions with drug customers and co-conspirators. Agents/officers have learned ROBERSON uses 1441 Hillcrest Avenue Apartment 4 & 8, 7216 Park Avenue, and 8685 Daly Road, to facilitate an ongoing illegal cocaine trafficking business. Agents/officers have learned ROBERSON uses his family members and his girlfriend, Dominique Hill residence, SUBJECT LOCATION 1, to sleep overnight and believe ROBERSON stores proceeds, phones, and documentation of ROBERSON's illegal narcotic trafficking at SUBJECT LOCATION 1.
20. Based on the foregoing, there is probable cause to believe that ROBERSON is currently located at 9563 Conservancy Place, West Chester Township, Ohio 45011. As such, your Affiant respectfully requests that the Court issue a warrant to search 9563 Conservancy Place, West Chester Township, Ohio 45011 -- a property more fully described in Attachment A hereto -- for the person of STEFFEN ROBERSON, a federal fugitive who is identified more fully in Attachment B.

*Cameron C. Rice*

Cameron C. Rice  
Special Agent  
Drug Enforcement Administration

Sworn to and subscribed before me this 15<sup>th</sup> day of November, 2021.  
via electronic means, specifically Facetime video.

*Stephanie K. Bowman*  
HONORABLE STEPHANIE K. BOWMAN  
UNITED STATES MAGISTRATE JUDGE



**ATTACHMENT A**

**PLACE TO BE SEARCHED:**

**9563 Conservancy Place, West Chester Township, Ohio 45011**

9563 Conservancy Place, West Chester Township, Ohio 45011 is a multi-family dwelling with the entrance door to this residence tan in color with white framing around the door and glass on both sides. The structure has tan siding with darker colored shutters, brown multi – colored bricks and an attached two car garage. The numeric “9563” are affixed to electric meter box attached to the right side of the front door which faces in an easterly direction.



**Attachment B**

**Person to Be Seized**

STEFFEN ROBERSON, who has an active federal arrest warrant in *United States v. ROBERSON*, CaseNo. 1:21-mj-00880, a criminal matter pending in the United States District Court for the Southern District of Ohio. ROBERSON, a picture of whom is set forth below, has a date of birth in January 12, 1981. Affiant can identify ROBERSON on sight.

